



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

AUG 10 2000

Mr. Glenn P. Ray
Vice President of Operations
Deep South Chemical, Inc.
P. O. Box 80657
Lafayette, LA 70598-0657

Ref. No. 00-0207

Dear Mr. Ray:

This is in reference to your letter forwarded from the Office of Enforcement and Compliance, Federal Motor Carrier Safety Administration, regarding an interpretation of 49 CFR 172.300. You ask if the proper shipping name is required to be marked on an intermediate bulk container(IBC).

The answer to your question is no. There is no requirement in the Hazardous Materials Regulations (49 CFR parts 171-180) to mark an IBC with a proper shipping name or technical name.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

Thomas G. Allan
Senior Transportation Regulations Specialist
Office of Hazardous Materials Standards



000207

172-331



Just The Right Chemistry

June 26, 2000

Sterlin Williams
Federal Motor Carrier Safety Administration
5304 Flanders Drive
Suite A
Baton Rouge, LA 70808

Dear Sterlin Williams:

Subject: Interpretation of 49 CFR 172.300

Question: Is the proper shipping name required to be marked on an Intermediate Bulk Container (IBC) with the appropriate shipping name as specified in table 172.101. If so, what is the specification size of the text?

I am requesting an interpretation on the marking section of the Code of Federal Regulations Section 49 CFR 172.300.

Our company ships hazardous materials listed in Table 172.101 of the CFR in Intermediate Bulk Containers. We placard the tanks with the combination placard and ID numbers. The sizes are 350 and 550-gallon capacities. We mark the tanks with the proper shipping name on our product labels with less than 1-inch lettering. I have attached the specification sheets on the type of containers we use as a reference for your knowledge. The regulations are plain on the general marking requirements for bulk packaging for the identification numbers. The requirement for marking the package with the proper shipping name and sizes for the material shown in the ~172.101 table are of concern to our company. The use of Intermediate Bulk Containers (IBC) poses the question of proper shipping name marking requirements. Please explain the ruling or requirements for marking the ID number and the Proper shipping name for products shipped in IBC containers.

Regards,
Glenn P. Ray
Vice President of Operations
Deep South Chemical, Inc.

